

# COHEN & GREEN

August 19, 2025

Honorable Rachel P. Kovner  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

By Electronic Filing

**Re:** *Antonio Eaddy v. United States*, Civ. No. 24-8109 (Kovner, J.) (Scanlon, M.J.)

Dear Judge Kovner:

I am co-counsel for Plaintiff Antonio Eaddy in this Federal Tort Claims Act (“FTCA”) lawsuit. I write, with Defendant’s consent, to respectfully request a two-week extension of time for Plaintiff to file a response to Defendant’s motion to dismiss the complaint from August 20, 2025 to September 3 and a concomitant extension of the deadline for Defendant to file a reply (September 3, 2025 to September 17, 2025).

This request for an extension is being made to permit additional time for the parties to discuss and enter into a confidentiality agreement for one of the Defendant’s declarations, which was provided to Plaintiff’s counsel with redactions. Additionally, my co-counsel has been engaged in a trial (*Girard v. St Louis et al*, 22-cv-00339-AJB-TWD (NDNY)).

This is the first request for an extension of the deadline to file a response the motion to dismiss. As noted above, Defendant consents to this request. Plaintiff thanks the Court for its consideration of this request.

Respectfully submitted,

/s/

\_\_\_\_\_  
Elena L. Cohen  
Cohen&Green P.L.L.C.  
*Attorneys for Plaintiff*  
1639 Centre St., Suite 216  
Ridgewood, New York 11385